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24 PACIFIC BELL TELEPHONE COMPANY

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

19 CALIFORNIA SPORTFISHING
20 PROTECTION ALLIANCE,

21 Plaintiff,

22 v.

23 PACIFIC BELL TELEPHONE COMPANY,

24 Defendant.

CASE NO. 2:21-cv-00073-JDP

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**DECLARATION OF NAVI SINGH
DHILLON IN SUPPORT OF MOTION TO
COMPEL COMPLIANCE WITH
SUBPOENA**

Judge: Hon. Jeremy D. Peterson
Complaint Filed: January 14, 2021
Zoom Hearing Date: November 9, 2023
Time: 10:00 a.m.
Courtroom: 9

1 I, Navi Singh Dhillon, hereby declare as follows:

2 1. I am a partner at the law firm of Paul Hastings LLP and counsel for Defendant Pacific
3 Bell Telephone Company (Pacific Bell) in the above-captioned litigation. I submit this declaration
4 in support of Pacific Bell's Motion to Compel Compliance with Subpoena. Unless otherwise
5 indicated, I have personal knowledge of the facts set forth herein and, if called as a witness, I could
6 and would testify competently thereto.

7 2. Attached as **Exhibit A** is a true copy of the transcript of relevant portions of the July
8 18, 2023, Lead Contamination Conference Call wherein Plaintiff's counsel, William Verick, spoke.

9 3. Attached as **Exhibit B** is a true copy of the subpoena issued on August 4, 2023, and
10 served on Below the Blue on August 9, 2023.

11 4. Attached as **Exhibit C** is a true copy of the meet-and-confer letter counsel for Pacific
12 Bell sent to the representative of Below the Blue, Seth Jones, on September 5, 2023.

13 5. Attached as **Exhibit D** is a true copy of emails between Pacific Bell's attorneys and
14 representatives of Below the Blue, between September 5, 11, 14, and 18, 2023, concerning the
15 subpoena at issue.

16 6. Attached as **Exhibit E** is a true copy of a Proof of Service provided by S.D.
17 Keshishian, a process server hired by Pacific Bell to serve Below the Blue, dated August 10, 2023,
18 and served August 9, 2023.

19 7. Attached as **Exhibit F** is a true copy of emails between Pacific Bell's attorneys and a
20 representative of Below the Blue, Seth Jones, between August 15, 2023 and August 23, 2023
21 concerning the subpoena at issue.

22 8. As of this writing, Pacific Bell has not received a single document from BTB in
23 response to the Subpoena. Nor has any legal counsel of BtB contacted Pacific Bell.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is true
25 and correct.

1 Executed September 26, 2023 in San Francisco, California.
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By: /s/ Navi Singh Dhillon
NAVI SINGH DHILLON